

LAW OFFICES OF

THOMAS F. LIOTTI, LLC

600 OLD COUNTRY ROAD - SUITE 530
GARDEN CITY, NEW YORK 11530

TELEPHONE: (516) 794-4700
FACSIMILE: (516) 794-2816
WEBSITE: www.tliotti.com

THOMAS F. LIOTTI♦

LUCIA MARIA CIARAVINO
Also Admitted in CT
DRUMMOND C. SMITH

JEAN LAGRASTA
ELLEN LUXMORE
Paralegals

Courtesy original of letter electronically filed with the Court

June 27, 2011

Hon. Magistrate Judge Arlene R. Lindsay
United States District Court
Eastern District of New York
Alfonso M. D'Amato U.S. Courthouse
100 Federal Plaza
Central Islip, NY 11722-4449

Re: Deborah Young, et al v. Suffolk County Department of Social Services, et al
Docket No. CV-09-3325(JFB)(ARL)

Hon. Magistrate Lindsay:

We are counsel for the plaintiffs with regard to the above-referenced matter.

With respect to Your Honor's Order dated January 24, 2011, we respectfully request an extension of time for the parties to complete outstanding discovery to August 31, 2011. It should be noted that our office has communicated with defendants' counsel to arrange a date for plaintiff's deposition, and said deposition has been arranged to take place on July 15, 2011. Thereafter, the deposition of the defendants will take place on a date to be determined. For the Court's information, the plaintiffs have provided it responses to the defendant's Requests for Interrogatories and the Production of Documents in direct compliance with the Order of this Court. Additionally, no party will be prejudiced by the extension; as our office has been in communication with Defendants' counsel and there have been mutual scheduling conflicts, as counsels for have been repeatedly engaged in other matters over the course of the past several months.

My office obtained consent for this extension from Scott E. Kossove, Esq., of L'Abbate, Balkan, Colavita & Contini, LLP, attorneys for the defendant Joseph Quatela, who is the sole defendant who has served discovery demands on the plaintiffs.

In light of the facts and circumstances presented to this Court, it is respectfully requested that the plaintiffs' request for an extension of time to complete discovery be granted.

Thank you for your attention and consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas F. Liotti", with a long horizontal flourish extending to the right.

Thomas F. Liotti

cc: All parties [via ECF and e-mail]